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**ATTORNEYS FOR THE HONORABLE PHILLIP JOURNEY,
ROSCOE B. MARSHALL, JR., ESTHER SCHNEIDER, AND OWEN MILLS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§ Chapter 11
	§
NATIONAL RIFLE ASSOCIATION	§ Case No. 21-30085-hdh11
OF AMERICA and SEA GIRT LLC	§
	§
Debtors ¹	§ Jointly Administered

**LIMITED RESPONSE TO
ACKERMAN MCQUEEN, INC.'S MOTION TO COMPEL DISCOVERY**

Phillip Journey (“Journey”), Roscoe B. Marshall, Jr. (“Marshall”), Esther Schneider (“Schneider”), and Owen “Buz” Mills (“Mills”) (collectively, the “Limited Responders”) hereby file this limited response to *Ackerman McQueen, Inc.’s Motion to Compel Discovery* [Docket No. 406] (the “Motion to Compel”) filed on March 24, 2021 and would show the Court as follows:

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

REPLY

1. The Motion to Compel is not actually directed at any of the Limited Responders. As a result, this is merely a limited response to the Motion to Compel.

2. However, the Motion to Compel does appear to be aimed at, in part, compelling the testimony of one member of the Limited Responders: specifically, Journey.

3. Journey, and all of the Limited Responders, are well aware of the existence of the attorney/client privilege, its application with regards to NRA matters in which they participate from time to time as current and/or former board members, and the importance of that privilege.

4. Moreover, they are aware that the NRA holds the privilege as to any communications delivered by or to them by an attorney in a closed executive session of the NRA.

5. Journey, and all of the Limited Responders, take no other position in this dispute and stand ready to comply with whatever order or directive this Court may issue after hearing the Motion to Compel.

Dated: March 25, 2021

Respectfully submitted by,

/s/ Clay M. Taylor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 25, 2021, a copy of the foregoing document was served on all parties requesting service via the Court's ECF system.

/s/ J. Robertson Clarke

J. Robertson Clarke